

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

Jonathan David McCoy,

Plaintiff,

v.

City of Columbia, John K. Passmore, James  
Heywood, and Amanda H. Long, all in their  
individual and official capacities,

Defendants.

Civil Action Number:  
5:10-cv-00132-JFA-KDW

**SUPPLEMENTAL VOIR DIRE ON  
BEHALF OF DEFENDANTS LONG,  
PASSMORE, AND HEYWOOD**

1. Is any member of the jury panel related to any other member of the jury panel? If so, would this person have undue influence over your opinion of this matter?

2. Has any member of the jury panel been detained by any law enforcement agency for any reason other than a minor traffic violation? This would apply whether or not you were charged as a result of this detention. Please explain the circumstances of that detention.

3. Has any member of the jury panel witnessed a suicide of another person or had a close family member or friend do so such that you could not give the parties a fair and impartial trial?

4. Has any member of the jury panel had a close family member or friend commit suicide so that you could not give the parties a fair and impartial trial?

*Attorney Certification*

*I have examined the court's standard juror questionnaires and believe the attached proposed voir dire does not duplicate these questionnaires or the court's standard inquiries as*

*set forth in Judge Anderson's SPECIAL INSTRUCTIONS. I believe the following questions are reasonable necessary for selection of an impartial jury.*

MBR Law, LLC

s/ Matthew B. Rosbrugh

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March 5, 2013